# In the Supreme Court
OF THE
# United States

OCTOBER TERM, 1939

## No. 671

SONTAG CHAIN STORES CO., LTD. (a corporation),

*Petitioner,*

vs.

NATIONAL NUT COMPANY OF CALIFORNIA (a corporation),

*Respondent.*

## RESPONDENT'S REPLY BRIEF OPPOSING PETITION FOR WRIT OF CERTIORARI.


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*To the Honorable Charles Evans Hughes, Chief Justice of the United States, and to the Associate Justices of the Supreme Court of the United States:*

Respondent, National Nut Company of California, replying to the petition of Sontag Chain Stores Co., Ltd., in the above entitled matter, respectfully submits that the present cause has been fully considered and properly decided by the United States Circuit Court of Appeals for the Ninth Circuit (National Nut Company of California

v. Sontag Chain Stores Co., Ltd., reported at 107 F. 2nd 318, advance sheets January 1, 1940); and that petitioner's petition for writ of certiorari is without merit and should be denied.

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**SUMMARY OF RESPONDENT'S POSITION.**

In opposing petitioner's petition for a writ of certiorari, respondent's position is as follows:

(a) Petitioner's summary and statement of matter involved, as set forth in its petition, is in various respects inaccurate, incomplete, or misleading.

(b) The reasons relied upon by petitioner for allowance of the writ it has prayed for are unsupported by the facts, and afford no proper grounds for the granting of such writ.

(c) The decision of the United States Circuit Court of Appeals for the Ninth Circuit here involved is founded upon the particular facts of the present case; and correctly applies well established principles of law to those facts.

(d) The decision here involved is not in conflict with other decisions of the United States Circuit Courts of Appeals upon the facts of this case, or upon equivalent facts in other cases.

(e) No important or difficult question of Federal law is raised in the present case which has not previously been considered and passed upon by the Supreme Court of the United States; and if any conflict exists between the present decision and other decisions of the United States Circuit Courts of Appeals (which, however, is denied) it is

because such other decisions have failed to apply principles of law heretofore laid down by decisions of the Supreme Court.

(f) The present case does not come within any of the classes of cases contemplated by rule 38 of the Rules of the Supreme Court; and presents no question meriting review by that Court.

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**PETITIONER'S STATEMENT OF MATTER TRAVERSED.**

Respondent disagrees with a number of the assertions of petitioner's summary and statement of matter involved; and submits that the statement in inaccurate, incomplete or misleading in various respects, including:

(1) Respondent submits that the case does not present squarely "the important and troublesome matter of intervening rights in relation to the broadened claims of a reissue patent" for the reason that the so-called doctrine of "intervening rights", if entitled to any recognition whatever, is not applicable to cases where, as here, the patent in suit is a valid reissue patent granted with broadened claims on an application filed with due diligence within two years after the grant of the original patent on which it is based.

*Stimpson v. Chester Railroad Co.* (1846), 4 How. 380, 11 L. Ed. 1020;

*Miller v. Brass Co.*, 104 U. S. 350, 26 L. Ed. 783;

*Mahn v. Harwood*, 112 U. S. 354, 5 S. Ct. 174;

*White v. Dunbar*, 119 U. S. 47, 7 S. Ct. 72;

*Topliff v. Topliff*, 145 U. S. 156, 12 S. Ct. 825;

*Abercrombie & F. Co. v. Baldwin*, 245 U. S. 198, 38 S. Ct. 104.

(2) Petitioner's statement that "The scope of such rights (intervening rights) and the principles governing their determination have not been fixed by decisions of this Court", while probably true in a strictly literal sense, is believed to be inaccurate and misleading. Respondent submits that the decisions of this Court preclude the existence of "intervening rights" and hence that this Court has not attempted to define the scope of, or lay down principles with respect to, supposed rights which the decisions of this Court definitely preclude. Obviously there could be no purpose in attempting to define the scope of rights which have no existence (see authorities cited in (1) above).

(3) Petitioner's statement (Petition, page 2, numbered paragraph 1) that "There was no infringment of the original patent" is misleading because it is only petitioner's conclusion. Neither the trial Court, nor the Circuit Court of Appeals was called upon to pass upon that point, since only claims 6, 8, 9, 10, 11, 13, 14, 15 and 17 of the reissue patent in suit were in issue (R. 87). Similar statements appearing in the petition, pages 5 and 6, are subject to the same criticism. Respondent's election to rely only upon a limited number of the new claims of its reissue patent is not an admission that other claims are not infringed.

(4) Petitioner's statement that "respondent by affirmative acts and litigation led petitioner to believe that it (respondent) was relying wholly upon the narrow claims of the original patent" is traversed on the ground that it is merely an erroneous conclusion by petitioner, unsupported by the facts of the case. Suit having been brought, the assumption is that the plaintiff will assert every right

properly available against the defendant, including, in this case, the right to have the original patent reissued. The right to secure a reissue is provided by statute, *U. S. C. A* Title 35, Sec. 64 (R. S. Sec. 4916). Petitioner is presumed to have known that, under the statute, respondent might secure a reissue of its original patent. In proceeding in disregard of that right, petitioner did so at its own risk. (See: *Abercrombie & F. Co. v. Baldwin,* supra).

(5) Petitioner's statement (petition, page 3) that the Circuit Court of Appeals, in reversing the District Court, arrived at "conclusions in conflict with the decisions of three other circuits" is believed to be inaccurate and misleading because it ignores the truth that the facts of this case have never been passed upon by any other Circuit Court of Appeals. The decisions of other courts on other facts present no real conflict with the decision of the Circuit Court of Appeals on the facts of the present case.

(6) In its statement of matter involved (petition, page 4, third and fourth paragraphs), petitioner attempts to attach significance to the fact that respondent's application for reissue was filed January 15, 1936, two days after the petitioner filed at San Francisco its answers to some of respondent's interrogatories. The point is immaterial; and is believed to be misleading because the reissue application was executed by the inventor at New York upon January 13, 1936 (Plaintiff's Ex. 4, offered in evidence at R. 100-1). Consequently, petitioner's answers to interrogatories could have had no influence upon petitioner's application prepared and sent to the inventor in New York prior to the time said answers to interrogatories were served and filed.

(7) Petitioner complains (petition, page 4, last paragraph) that respondent did not notify petitioner of its application for reissue, but that, "by keeping the petitioner busy with interrogatories" led petitioner to believe that it relied on its original patent. In this, petitioner ignores the fact that respondent's application for reissue was purely an *ex parte* proceeding; and could have no effect upon the pending litigation unless and until the reissue was granted. Also, it is to be noted that it was petitioner's objections and refusal to answer some of respondent's interrogatories that extended proceedings in connection therewith from the time objections were filed January 13, 1936 (R. 70-76) up to the time answers were ultimately filed upon May 16, 1936 (R. 77-80); and that the interrogatories were material to respondent's cause of action regardless of the filing of the reissue application.

(8) Petitioner's statement (page 5, lines 3-5) that it "continued to use the accused machine in reliance upon the narrow claims of the original patent", must be considered in the light of the fact that respondent possessed the statutory right to secure a reissue; and that such continued use was in complete disregard of that fact and of respondent's rights, as ultimately determined by the Circuit Court of Appeals. Certainly, since suit had been brought, petitioner had no reason to assume that respondent would abandon its right to secure a reissue in furtherance of that suit.

(9) Petitioner's summary of the holding of the Circuit Court of Appeals is incomplete in that it ignores the express holding of said Court that the case presents "*no facts creating an estoppel*" (R. 310). Continued use of an infringing machine in disregard of rights expressly

granted to a patentee by statute (*U. S. C. A.* Title 35, Sec. 4, R. S. Sec. 4916), knowledge of which is imputed to petitioner, can afford no grounds for an estoppel, particularly in view of the decision of this Court in *Abercrombie v. Baldwin,* supra.

(10) Petitioner's queries, set forth in numbered paragraphs 1, 2 and 3 of its summary statement of matter involved (petition, pages 2 and 3) relate to questions of fact which the Circuit Court of Appeals has considered and decided adversely to petitioner. It is submitted that no question of general Federal law has been presented which merits review by this Court.

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**THE REASONS RELIED UPON BY PETITIONER FOR ALLOWANCE OF WRIT ARE WITHOUT MERIT.**

Petitioner has set forth two reasons relied upon for allowance of the writ of certiorari it has prayed for. Both reasons are believed to be without merit.

1. Petitioner's first reason is that the case involves "important" and "difficult" questions of Federal law "which have not been but should be decided by this Court." Granting that the questions are important, they present no difficulty when properly considered in the light of principles of law long ago announced by this Court. As a matter of fact, the questions have been considered, and have been adequately and properly answered by the United States Supreme Court in decisions dating back more than a hundred years.

As noted by the Circuit Court of Appeals in its decision here involved (R. 290) the first Supreme Court ruling on

the subject of reissue patents was in the case of *Grant v. Raymond*, 6 Pet. (31 U. S.) 218, 243, 8 L. Ed. 376 (1832) which arose prior to any statute authorizing the reissue of a patent. The Court there held that a reissue could properly be granted, even without a statutory provision on that point. Mr. Chief Justice Marshall delivered the opinion and (at page 243) stated:

> "It has been said that this permission to issue a new patent on a reformed specification, when the first was defective through the mistake of the patentee, would change the whole character of the act of Congress.
>
> We are not convinced of this. The great object and intention of the act is to secure to the public the advantages to be derived from the discoveries of individuals, and the means it employs are the compensation made to those individuals for the time and labor devoted to these discoveries, by the exclusive right to make, use and sell, the things discovered for a limited time. That which gives complete effect to this object and intention, by employing the same means for the correction of inadvertent error which are directed in the first instance, cannot, we think, be a departure from the spirit and character of the act.
>
> An objection much relied on is, that after the invention has been brought into general use, those skilled in the art or science with which it is connected, perceiving the variance between the specification and the machine, and availing themselves of it, may have constructed, sold and used the machine without infringing the legal rights of the patentee, or incurring the penalties of the law. The new patent would retroact on them, and expose them to penalties to which they were not liable when the act was committed.
>
> This objection is more formidable in appearance than in reality. It is not probable that the defect in the specification can be so apparent as to be perceived by any but those who examine it for the purpose of pirating the invention. They are not entitled to much favor."

The doctrine of *Grant v. Raymond* was reaffirmed in the case of *Shaw v. Cooper* (1833), 7 Pet. 292, 8 L. Ed. 689, where Mr. Justice McLean says (at 315):

> "That the holder of a defective patent may surrender it to the Department of State and obtain a new one which shall have relation to the emanation of the first, was decided by this court at the last term in the case of *Grant et al. v. Raymond* (6 Peters, 220). The *Chief Justice*, in giving the opinion of the court, says: 'But the new patent, and the proceedings on which it issues, have relation to the original transaction. The time of the privilege still runs from the date of the original patent. The application may be considered as appended to the original application; and if the new patent is valid, the law must be considered as satisfied if the machine was not known or used before that application.'
>
> As this decision must be considered as settling the construction of the patent laws on this point, it is conclusive in the present case; and it is therefore unnecessary to examine the argument of the plaintiff's counsel, which was designed to lead to a different conclusion.
>
> The second patent being a continuation of the first one, the rights of the plaintiff must be ascertained by the law under which the original application was made."

The question of "intervening rights" arose and was specifically answered by the Supreme Court in its decision in *Stimpson v. West Chester Railroad Co.* (1846), 4 How. 380. There the question of an "intervening right" was squarely presented by a charge given to the jury by the trial judge as follows:

> "'It clearly appears that the defendants constructed their railroad with the plaintiff's curves in 1834, one year or more before the plaintiff's application for his renewed patent; consequently, they may continue its use without liability to the plaintiff.'"

After noting the charge and discussing the pertinent statutory provisions, Mr. Justice McLean in delivering the opinion of the Court stated (page 402):

> "The above proviso would seem to be susceptible of but one construction; and that is, that the patentee may sustain an action 'for any use or violation of his invention after the grant of the new patent.' Now, it is plain that no prior use of the defective patent can authorize the use of the invention after the emanation of the renewed patent under the above section. To give to the patentee the fruits of his invention was the object of the provision; and this object would be defeated if a right could be founded on a use subsequent to the original patent and prior to the renewed one.
>
> The thirteenth section of the Act of the 4th of July, 1836, which remodeled the patent law in this respect, made no material change in the Act of 1832. The words in the latter act are: 'And the patent, so re-issued, together with the corrected description and specification, shall have the same effect and operation in law, on the trial of all actions hereafter commenced for causes subsequently accruing, as though the same had been originally filed in such corrected form, before the issuing out of the original patent.' Now, any person using an invention protected by a renewed patent subsequently to the date of this act is guilty of an infringement, however long he may have used the same after the date of the defective and surrendered patent.
>
> The Circuit Court relied upon the seventh section of the Act of the 3d of March, 1839, as sustaining their construction in regard to the use of the invention after the renewed patent. But that section has exclusive reference to an original application for a patent, and not to a renewal of it. We think the court erred in their instruction to the jury above stated."

By later decisions, the Supreme Court laid down the general rule that a broadened reissue patent cannot be

validly granted if the application therefor was filed more than two years after the date of the original patent, unless longer delay is adequately excused.

*Miller v. Brass Co.* (1881), 104 U. S. 350;
*Mahn v. Harwood* (1884), 112 U. S. 354;
*White v. Dunbar* (1886), 119 U. S. 47;
*Topliff v. Topliff* (1891), 145 U. S. 156.

The two-year rule, as first announced in *Miller v. Brass*, and reaffirmed in *Mahn v. Harwood*, was arrived at by analogy to the rule that two years of public use prior to application will bar the grant of a valid patent. In other words, failure to correct a defective patent within two years after its grant constitutes a dedication of unclaimed subject matter to the public, just as two years of public use before an original application bars the grant of a valid patent. Subject to such limitation, a reissue patent validly granted under the provisions of the reissue statute relates back to the date of the original patent upon which it is based.

The rule announced in *Stimpson v. West Chester Railroad Co.* supra, stands unchanged, and its application is limited only by the two-year rule subsequently laid down by the Supreme Court. The rights granted by a valid reissue patent issued pursuant to the reissue statute are not affected by what others may have done in the interval between the grant of the defective original patent and the application for reissue. This was again affirmed in *White v. Dunbar*, supra, wherein the opinion by Mr. Justice Bradley states (at page 52):

> "We attach no importance to the fact that between the date of the original patent and the application for the reissue, the patent to Pecor and Bartlett was

granted. It is, indeed, quite apparent that the appellees applied for a reissue in consequence of that patent, and in order to prevent the canning of shrimps under it. The circumstance that other improvements and inventions, made after the issue of a patent, are often sought to be suppressed or appropriated by an unauthorized reissue, has sometimes been referred to for the purpose of illustrating the evil consequences of granting such reissues; but it adds nothing to their illegality. That is deduced from general principles of law as applied to the statutes authorizing reissues, and affecting the rights of the government and the public."

More recently the principle established by *Stimpson v. West Chester Railroad Co.* and reaffirmed in *White v. Dunbar* has been properly applied in the decision rendered in *Abercromb & F. Co. v. Baldwin* (245 U. S. 198) where Mr. Justice McKenna states (page 209):

"To the contention that the Justrite Company, the manufacturing defendant, acquired rights before the reissue, we again may oppose the reasoning and conclusion of District Judge Mayer and their affirmance by the Circuit Court of Appeals. The learned judge said:

'It will be remembered that this company entered the field with its lamp at a time when the validity and scope of the Baldwin patent were still unquestioned and when after some five years of capable effort, the Baldwin lamp had created an extensive market. The Justrite Company took its chances, and, in view of the necessities of the situation, it is relieved of all accountability for the period prior to the granting of the reissue patent; but when the reissue statute was granted the Justrite Company again took its chances.

'By the reissuance of the patent, the patentee loses all in the way of an accounting under the original patent, but the dominant purpose of the reissue statute was to save to the inventor the future remaining after the reissue.

'I see nothing in the course of plaintiffs or defendants which would allow a court of equity to conclude that defendants are to be relieved because of intervening rights.' ".

In *Topliff v. Topliff* the Supreme Court reviewed a number of its prior decisions and summarized the effect of its previous holdings, as follows (beginning at page 170):

"From this summary of the authorities it may be regarded as the settled rule of this court that the power to reissue may be exercised when the patent is inoperative by reason of the fact that the specification as originally drawn was defective or insufficient, or the claims were narrower than the actual invention of the patentee, provided the error has arisen from inadvertence or mistake, and the patentee is guilty of no fraud or deception; but that such reissues are subject to the following qualifications:

*First.* That it shall be for the same invention as the original patent, as such invention appears from the specification and claims of such original.

*Second.* That due diligence must be exercised in discovering the mistake in the original patent, and that, if it be sought for the purpose of enlarging the claim, the lapse of two years will ordinarily, though not always, be treated as evidence of an abandonment of the new matter to the public to the same extent that a failure by the inventor to apply for a patent within two years from the public use or sale of his invention is regarded by the statute as conclusive evidence of an abandonment of the patent to the public.

*Third.* That this court will not review the decision of the commissioner upon the question of inadvertence, accident, or mistake, unless the matter is manifest from the record; but that the question whether the application was made within a reasonable time is, in most, if not in all, such cases, a question of law for the court."

The Court here correctly recognized that, under some circumstances third persons *might* acquire an "intervening right" to make, use or sell that which the patentee had originally failed to claim. For example, one who had practiced the invention for two years before the application for a reissue might properly be held to have acquired rights in derogation of the reissue patent. Again, circumstances might arise which would create an estoppel affecting the right of a reissue patentee to enforce his patent against a particular party in whose favor the estoppel might operate.

In the present case, the Circuit Court of Appeals in its decision (R. 308-309) has aptly summarized the principles laid down in the decisions of the Supreme Court; and applying those principles has held that petitioner has acquired no intervening rights and that the case presents no facts creating an estoppel.

2. The second reason assigned by petitioner for an allowance of the writ prayed for is that the decision of the Circuit Court of Appeals is in conflict with the law as formulated by other Circuit Courts of Appeals. Respondent submits that no such conflict exists. The decisions in the cases cited and relied upon by petitioner as showing such alleged conflict are based upon different facts.

In the *Roos Co. v. McMillan* case cited by petitioner, the Court expressly found on the facts of that case that the patentee was barred by laches or estoppel. In the present case, the Circuit Court of Appeals has held that the facts show no laches or estoppel.

In *Autopiano Co. v. American Player Action Co.*, a second reissue was granted more than six years after the original patent in an effort to reclaim claims previously abandoned in securing a first reissue. No comparable situation is involved in the present case.

The third case relied upon by petitioner *(Wichita Visible Gasoline Pump Co. v. Clear Vision Pump Co.)*, also involves an express finding of estoppel. In the present case, the Court has expressly found that no estoppel has arisen.

If there be any conflict between the decision of the Circuit Court of Appeals in the present case and the decisions of other Circuit Courts of Appeals in other cases (which, however, is denied) such conflict has arisen because of the failure of such other Courts to apply the principles which have been laid down by the Supreme Court in the decisions above referred to. In the present case, the Circuit Court of Appeals has observed and applied the rules and principles announced by the Supreme Court throughout the past hundred years. If other Courts, by failure to observe and apply those rules and principles, have rendered decisions in conflict therewith, that circumstance can afford no reason for subjecting this respondent to the delay and expense of a review by the Supreme Court of the present decision wherein said rules and principles have been followed.

Should this Court be disposed to again pass upon the question of so-called "intervening rights", it is believed that it should be in connection with a review of a decision in *conflict* with the past decisions of this Court; and not

in a case, such as the present case, where the decision of the Circuit Court of Appeals is in full accord with the decisions of this Court.

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## REPLY TO PETITIONER'S ARGUMENT.

For the most part, petitioner's argument is adequately disposed of by the points above discussed, and the authorities above cited. As to the matter of alleged "laches" and "estoppel" predicated upon the particular facts of the case, only a brief further refutation is necessary.

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### I.

### RESPONDENT IS NOT BARRED BY "LACHES".

Petitioner would have this Court believe that, because the application for the reissue patent here involved was not filed until twenty months after the grant of the original patent on which it is based, that respondent is barred by "laches" from asserting the broadened claims of the reissue against petitioner. The facts do not support petitioner's contention; and both the Patent Office and the United States Circuit Court of Appeals have so held by granting the reissue and affirming its validity. Respondent and its officers believed that the original Kohler patent here involved included broad and proper claims (R. 106-7); and in the utmost good faith asserted its patent rights against the present petitioner, even to the extent of bringing suit to enforce those rights. Upon discovering the partial inoperativeness of its original patent, it immediately made application for reissue, the

application being filed well within the two-year rule laid down by the Supreme Court. At all times, respondent has acted diligently in securing and enforcing the rights to which it is entitled under the patent laws; and the Circuit Court of Appeals has properly held that the defense of "laches" has not been sustained. That the point has been duly considered by the Circuit Court of Appeals is apparent from its statement (R. 289) that "The burden of proving a defense of laches or estoppel is on the defendant," (citing authority).

The authorities relied upon by petitioner in support of its alleged defense of "laches" have been hereinabove referred to. In each case, the decision was based upon the particular facts of the case under consideration; and in each case the facts were peculiar to the case, and materially different from the facts of the present case. Because of wide differences in the facts involved, it is submitted that the authorities relied upon by petitioner are without material bearing upon the issues presented in the present case.

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## II.

### RESPONDENT IS NOT ESTOPPED FROM ASSERTING ITS REISSUE PATENT AGAINST PETITIONER.

The Circuit Court of Appeals has expressly held that the facts of the present case do not give rise to an estoppel. Indeed, the facts in this case point conclusively to an absence of estoppel.

Petitioner was notified of its infringement; and upon failing to reply to the notice of infringement, was made

defendant in a suit based upon respondent's original patent. The record does not suggest, nor can it be assumed, that respondent was acting otherwise than in the utmost good faith at all times.

Upon discovering the partial inoperativeness of its original patent in suit, respondent promptly applied for its reissue. Application for such reissue could not be delayed until after the termination of the pending litigation, as the two-year rule laid down by the Supreme Court might then have barred the grant of a valid broadened reissue. The facts and circumstances leading to the application for reissue were fully disclosed to and considered by the Patent Office in connection with the reissue application; and, facts warranting the grant of respondent's reissue having been established, the reissue patent was duly and regularly issued. The Circuit Court of Appeals has accepted and sustained the Patent Office action, and the validity of respondent's reissue patent.

Suit having been brought upon respondent's original patent, petitioner was on notice that respondent was asserting its patent rights against petitioner. In ignoring respondent's notice of infringement, and in continuing to use the machine complained of, even after suit was brought, petitioner in no way changed its position in reliance upon supposed limitations in the claims of respondent's original patent, either before or after suit was brought. If petitioner chose to disregard respondent's right to secure a reissue of its patent in suit, it did so at its own risk (see *Abercrombie v. Baldwin*, supra).

To invalidate an original patent on the ground of

prior to the filing of the application resulting in the patent; and such use must be proved *beyond reasonable doubt* (see *Washburn & Moen etc. v. Beat 'Em All Barbed-Wire Co. (The Barbed Wire Patent)*, 143 U. S. 275, 12 S. Ct. 443). The same rule should, and under the decisions of the Supreme Court does, apply in the case of reissue patents. There is nothing in law or in logic to support petitioner's theory that the period of public use, or infringing use, necessary to defeat a reissue patent should be less than that required to invalidate an original patent merely because of the circumstance that by inadvertence, accident or mistake the original patent was required to be reissued in order to secure for the patentee the full measure of the rights to which he was entitled under the patent laws.

The grant of a valid original patent is effective against a prior user whose use does not antedate the patent application by two years, regardless of whether such use was innocent, or intended to appropriate the invention of the patentee. For the same reason, a valid reissue is effective against one who has practiced the patented invention for less than two years; and the rule should be the same whether such use were innocently begun, or if it were intended to evade the patent on which the reissue is based. Certainly the patent laws were designed to aid the inventor and patentee. Where, as here, the patentee avails himself of the privileges extended to him under the patent laws, his rights as defined by his patent obviously should prevail over the personal interests of others seeking private gain by appropriating that which belongs to the patentee. One who deliberately seeks to take advantage of the mistake of

another and by a technicality evade responsibility for an infringing act, is entitled to little sympathy from the Courts of justice.

In any event, the matter of whether the facts of a specific case give rise to an estoppel presents no important question of general Federal law warranting review by the Supreme Court of the present decision founded upon the facts of the present case.

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## CONCLUSION.

In view of the decisions of the United States Supreme Court hereinabove cited, and the ruling by the Circuit of Appeals for the Ninth Circuit in the present case that no defense of "intervening right", "estoppel" or "laches" is available to petitioner, it is submitted that petitioner's petition presents no question meriting review by this Court; and that the petition should be denied. Respondent therefore prays that said petition be denied; and for such other and further relief as may seem proper in the premises.

Dated, San Francisco, California,
February 16, 1940.

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